

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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NAOMI PETERSON,

:
: No. 1:11-cv-01087-(ENV) (RER)

: Petitioner

For an Order Pursuant to Article 75 of the CPLR
Vacation an Arbitration Award of a certain controversy

: **RESPONDENT'S NOTICE
OF MOTION**

: -against-

VERIZON, INC.,

: Respondent

-----x
PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and upon all the pleadings and proceedings herein, Respondents, Verizon Inc. (the “Respondent”), by their undersigned counsel, will move this Court, at a date and time to be determined by the Court, before The Honorable Ramon E. Reyes, Jr., United States Magistrate Judge, Eastern District of New York, at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York 11201, for an order pursuant to Rule 12(b)(6) & (7) of the Federal Rules of Civil Procedure granting Respondent’s Motion to Dismiss the Verified Amended Petition, and for such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Court’s Order, Petitioner’s papers in opposition to Respondent’s motion are to be served in thirty (30) days, and Respondent’s reply papers are to be served two (2) weeks thereafter.

Dated: New York, New York
May 20, 2011

Respectfully submitted,
SEYFARTH SHAW LLP

By: s/ Paul H. Galligan
Paul H. Galligan (PG 3083)
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Attorneys for the Respondent

CERTIFICATE OF SERVICE

I hereby certify that on May 20, 2011, I electronically filed the foregoing Notice of Motion with the Clerk of the District Court using the CM/ECF system, which sent which sent notification of such filing to all counsel of record.

/s Paul Galligan
Paul Galligan